

CORRES. CONTROL
OUTGOING LTR. NO.

DOE ORDER #

97-RF-05205

DIST.	LTR	ENC
SENSUSSEN, STAN		
RAILSFORD, MARV		
UHL, TONY		
BURDGE, LARRY		
HARDING, WYNN		
HARD, BOB		
HILL, JOHN		
MARTINEZ, LEN		
OGG, BOB		
ARKER, ALAN		
ILLER, ROBERT		
UOR, NANCY		
DOORHEIS, GARY		

edahl, T. G.	X	X
Anderson, Scott		
etamore, Drew		
ahn, Steve		
ckle, Gordon		
nnedy, Colburn		
hould, Russ		
eben, Ann	X	X
iland, Jennifer		

RRS.CONTROL	X	X
VIN RECRD/116	X	X
TS/T130G		

CLASSIFICATION:		
VI		
CLASSIFIED		
CONFIDENTIAL		
SECRET		

THORIZED CLASSIFIER
SIGNATURE:

empt per CEX-266-95

REPLY TO RFP CC NO.:

ACTION ITEM STATUS:
PARTIAL/OPEN

☐ CLOSED

LTR APPROVALS:

AKS

RIG. & TYPIST INITIALS:

AKS :bag

469 (Rev. 7/97)



KAISER HILL
COMPANY

September 26, 1997

Norma Castaneda
ES&H Program Assessment
DOE, RFFO

OU1 IM/IRA MODIFICATION COMMENTS - AKS-047-97

Enclosed please find three copies of the response to Environmental Protection Agency (EPA) comments regarding the OU1 IM/IRA modification.

Please review and transmit the responses to EPA and Colorado Department of Public Health and Environment (CDPHE) (draft letters enclosed) at your earliest convenience.

Please contact me at 966-9886 if you have any questions regarding these comments.

A. K. Sieben
Waste & Remediation Operations

bag

Orig. and 1 cc - N. Castaneda

Enclosures:
As Stated (3)

Kaiser-Hill Company, L.L.C.

Courier Address: Rocky Flats Environmental Technology Site, State Hwy. 93 and Cactus, Rocky Flats, CO 80007 • 303.966.7000

Mailing Address: P.O. Box 464, Golden, Colorado 80402-0464

A-DU01-001349



97-RF-05205

RESPONSE TO EPA COMMENTS ON OUI IM/IRA MODIFICATION CRITERIA

Four primary concerns were presented in the recent Environmental Protection Agency correspondence received August 27, 1997 regarding the Operable Unit 1 Interim Measure/Interim Remedial Action modification. The comments have been reviewed and the proposal will be adjusted as discussed below.

The first comment indicates that there are some discrepancies between other IM/IRA documents and the proposed modification language. These discrepancies will be reconciled by stating that the requirements outlined in the Record of Decision will be incorporated into IM/IRA activities as they apply to the OUI modification. Attachments 1 and 2 will be modified accordingly.

Knowledge of the process for the Consolidated Water Treatment Facility (CWTF), groundwater purge water, and the decontamination facility suggest that under normal circumstances sampling is not required in order to treat the water successfully at the CWTF. Utilization of this method has led to substantial improvements in the efficiency of water transfer operations. Since the CWTF is currently in use for other operations, there is no additional cost for the treatment of this water. However, additional costs would be incurred if each tank of decontamination water were to be sampled and dispositioned individually. If there are any indications that unusual levels of contamination may be present, waters will be sampled prior to arrival at the CWTF. In addition, the procedure for verifying effluent water quality before discharge adds an additional measure of environmental protection.

The verbiage on Footnote 3 in Table 3-1 has been altered to make it more definitive that samples will be taken to include all of the Radiochemistry listed: Gross Alpha/Beta, Plutonium, Americium, and Uranium.

The term CRDL was used in the table describing deviations from the RFCA list. The CRDLs are equivalent to analytical laboratory PQLs. RFCA indicates that PQLs are to be used when the standard is not achievable. Since the values are synonymous, the acronym PQL will be used in place of CRDL to avoid confusion.

CC: J Law
N Cypher
F Huffman
J Schmuck
G Digregorio

DRAFT

Date

Tim Rehder
EPA
999 18th Street
Suite 500
Denver, CO 80202

OU1 IM/IRA MODIFICATION COMMENTS - XXX-XXX-97

Enclosed please find a copy of the response to EPA comments regarding the OU1 IM/IRA modification.

Please contact Russ Cirillo at 966-5876 if you have any questions regarding these comments.

Contact
Title

XXX:xxx

Attachment:
As Stated

cc:

DRAFT

Date

Mr. Steve Tarlton
Colorado Dept. of Public Health and Environment
4300 Cherry Creek Drive South
Denver, CO 80222-1530

OU1 IM/IRA MODIFICATION COMMENTS - XXX-XXX-97

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Contact
Title

XXX:xxx

Attachment:
As Stated

cc: